

Federal Defenders OF NEW YORK, INC.

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MEMO ENDORSED

February 5, 2025

Application GRANTED. Jones Law Firm is hereby authorize to act as escrow agent for Heritage Integrity Investment Trust.

SO ORDERED.

JESSICA G. L. CLARKE
United States District Judge

Dated: February 6, 2025
New York, New York

BY ECF

The Honorable Jessica G.L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Isaac Briggs, III
23-CR-0644 (JGCL)

Dear Judge Clarke:

Isaac Briggs, III, through undersigned counsel, respectfully asks the Court to enter an order modifying the conditions of his pretrial release. Specifically, he asks the Court for permission to authorize the Jones Law Firm to act as escrow agent for Heritage Integrity Investment Trust (hereinafter, "Heritage") in order to (1) collect debts owed to Heritage; and (2) take further action, as needed, to liquidated Heritage's assets (i.e., to set up a brokerage account for Heritage and sell Notes at current market). Currently, however, Mr. Briggs' release conditions require him to cease all work in Heritage, and further prohibits him from opening any investment accounts.

Undersigned counsel has conferred with the government about this request. The government takes no position on the request.

It is also undersigned counsel's understanding that the civil attorney representing at least one of the victims in this criminal case has no objection to the Jones Law Firm acting as escrow agent for Heritage.

The Jones Law Firm has represented that, when acting as escrow agent, to the extent that it is able to collect funds for Heritage, it would use those funds, first draw, to pay off all acknowledged creditors of Heritage; and second draw, it would retain in escrow, sufficient funds to satisfy any claims against Heritage that are still in dispute. All creditors and disputed claimants would be funded before any distribution would be made to Mr. Briggs.

Granting the requested modification would thus be the first step in placing Mr. Briggs in a position to satisfy his restitution and criminal forfeiture obligations, which he is eager to do. Accordingly, Mr. Briggs asks the Court to grant the requested modification.

Respectfully Submitted,
/s/
Kristoff I. Williams
Assistant Federal Defender
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